

**MEMO ENDORSED**

DAVID T. MALOOF (DM 3350)  
 THOMAS M. EAGAN (TE 1713)  
 MALOOF BROWNE & EAGAN LLC  
 411 Theodore Fremd Avenue - Suite 190  
 Rye, New York 10580  
 (914) 921-1200

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

AUG 25 2008

USDS SDNY
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ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/25/08

In the Matter of the Complaint

08 Civ.3714 (LAK)

Of

**NOTICE OF MOTION**

Salt Route, Ltd., as Owner of the M/V  
 JOANNE I, For Exoneration from or  
 Limitation of Liability

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 PLEASE TAKE NOTICE THAT, pursuant to the Local Rule 1.4, and  
 upon the Declaration of Thomas M. Eagan dated July 9, 2008, and the accompanying  
 Stipulation, Claimants Abonos Colombianos S.A. and Industria Nacional de Gaseosas  
 S.A., will move this Court before the Honorable Lewis A. Kaplan, United States District  
 Judge, in the United States Courthouse, Room 1310, 500 Pearl Street, New York, New  
 York 10013, for an Order Substituting its Attorneys and for such other relief as the Court  
 deems proper and just.

Dated: Rye, New York  
 July 9, 2008

MALOOF BROWNE & EAGAN LLC

By \_\_\_\_\_

*R. Maloof*  
 David T. Maloof (DM 3350)  
 Thomas M. Eagan (TE 1713)  
 411 Theodore Fremd Avenue – Suite 190  
 Rye, New York 10580  
 Tel: (914) 921-1200  
 Fax: (914) 921-1023  
 Attorneys for Claimant

**Application GRANTED**  
*AUG 21 2008*

**SO ORDERED:**

*Paul A. Crotty*

HON. PAUL A. CROTTY  
 UNITED STATES DISTRICT JUDGE